

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

BAKER SOLUTIONS, INC. d/b/a
CREDITBAKER,

Defendant.

Case No. 2:25-CV-01792-GJP

JURY TRIAL DEMANDED

**DEFENDANT BAKER SOLUTIONS, INC.’S ANSWER,
AFFIRMATIVE DEFENSES, AND DEMAND FOR A TRIAL BY JURY**

Defendant Baker Solutions, Inc. d/b/a CreditBaker (“Defendant”), by and through its undersigned counsel, Kaufman Dolowich LLP, now answers the Class Action Complaint (Doc. 1) of Plaintiff Leon Weingrad (“Plaintiff”), and states as follows:

1. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
2. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
3. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

PARTIES

4. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

5. Admitted in part; denied in part. Defendant admits that it does business under the name CreditBaker and has an office located in New York. The remaining allegations contained in this Paragraph of Plaintiff's Complaint, if any, are denied.

JURISDICTION AND VENUE

6. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

7. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

8. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

BACKGROUND

9. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

10. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

11. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

12. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

13. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

14. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

15. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

FACTUAL ALLEGATIONS

16. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

17. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

18. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

19. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

20. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

21. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

22. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

23. Denied. Defendant is without knowledge or information sufficient to form a belief

as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

24. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

25. Denied.

26. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

27. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

28. Denied.

29. Admitted in part; Denied in part. Defendant admits that calls were made by an individual named "Dennis Romero" to Plaintiff. The remaining allegations contained in this Paragraph of Plaintiff's Complaint, if any, are denied.

30. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same. Further, the e-mail referenced in this Paragraph constitutes a writing the terms of which speak for themselves and Defendant denies all such characterizations of the same.

31. Denied. The text message referenced in this Paragraph constitutes a writing the terms of which speak for themselves and Defendant denies all such characterizations of the same.

32. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same. Further, the text messages referenced in this Paragraph constitute a

writing the terms of which speak for themselves and Defendant denies all such characterizations of the same.

33. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

34. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same. Further, the text message referenced in this Paragraph constitutes a writing the terms of which speak for themselves and Defendant denies all such characterizations of the same.

35. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

36. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

37. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

38. Denied. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations, if any, contained in this Paragraph of Plaintiff's Complaint, and therefore denies the same.

39. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

40. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

41. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

42. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

43. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

44. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

CLASS ACTION ALLEGATIONS

45. Defendant incorporates its responses to the allegations contained in Paragraphs 1 through 44 above and incorporates them as if specifically set forth at length herein.

46. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

47. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

48. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

49. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

50. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

- a. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- b. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- c. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- d. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- e. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- f. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

51. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

52. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

- a. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- b. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.
- c. Denied. The allegations in this Paragraph, if any, are denied as a legal

conclusion to which no response is required.

- d. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

COUNT I

53. Defendant incorporates its responses to the allegations contained in Paragraphs 1 through 52 above and incorporates them as if specifically set forth at length herein.

54. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

55. Denied.

56. Denied.

57. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

58. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

COUNT II

59. Defendant incorporates its responses to the allegations contained in Paragraphs 1 through 58 above and incorporates them as if specifically set forth at length herein.

60. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

61. Denied.

62. Denied.

63. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

64. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

COUNT III

65. Defendant incorporates its responses to the allegations contained in Paragraphs 1 through 64 above and incorporates them as if specifically set forth at length herein.

66. Denied.

67. Denied.

68. Denied. The allegations in this Paragraph, if any, are denied as a legal conclusion to which no response is required.

WHEREFORE, Defendant requests that this Court dismiss Plaintiff's Complaint in its entirety with prejudice, and award Defendant its reasonable attorney's fees and costs incurred in defending this action. Defendant further requests that this Court deny any other requested damages, fees, costs, other legal and equitable relief, and award such other relief as the Court deems just and equitable.

AFFIRMATIVE DEFENSES

1. Plaintiff has failed to state a claim upon which relief can be granted.
2. Plaintiff's claims may be barred by the statute of limitations.
3. Plaintiff provided consent to receive communications from Defendant.
4. Defendant's contact with Plaintiff was not a solicitation but was in direct response to a request for information.
5. The communication at issue was for a business purpose.
6. Defendant reserves the right to assert additional affirmative defenses that may be revealed during the course of discovery.

DEMAND FOR A TRIAL BY JURY

Defendant demands a trial by jury under Federal Rule of Civil Procedure 38 for all issues so triable.

Respectfully submitted:

KAUFMAN DOLOWICH, LLP

By: /s/ Richard J. Perr
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Attorneys for Defendant, Baker Solutions, Inc. d/b/a
CreditBaker

Dated: June 4, 2025

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on this date I caused to be served a true and correct copy of the foregoing electronically via the Court's CM/ECF system on the following:

Andrew Roman Perrong
Perrong Law LLC
2657 Mt. Carmel Ave
Glenside, PA 19038
Email: a@perronglaw.com

Attorney for Plaintiff Leon Weingrad

/s/ Richard J. Perr
RICHARD J. PERR, ESQUIRE

Date: June 4, 2025